

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LUIS DANNY SOTO,

Plaintiff,

-against-

State of New York, State of California,

State of Florida, State of North Carolina,

State of South Carolina, State of Michigan,

State of Arizona, State of Georgia,

State of Alaska, State of Hawaii,

State of Colorado, State of Pennsylvania,

State of Washington, State of Texas,

State of New Jersey, State of Ohio,

State of Louisiana, State of Illinois,

State of Massachusetts, State of Minnesota,

State of Nevada, United States of America,

Nation of Mexico, Nation of Israel, Nation

of Colombia, Nation of Canada, Nation of

Jamaica, United Kingdom, Nation of

Northern Ireland, Metropolitan

Transportation Authority, Port Authority of

New York And New Jersey, Tower 1, Joint

Venture LLC, Larry A. Silverstein,

Silverstein Properties Incorporated, OHIO

EST., THR Management LP,

Defendants.

Case No. _____

COMPLAINT

JURY TRIAL DEMANDED

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Plaintiff LUIS DANNY SOTO (“Plaintiff”) brings this action for damages against New York State Police, City Of New York Police Department, Office Of The Sheriff Of The City Of New York, New York City Police Department Housing Bureau, Port Authority Of New York And New Jersey Police Department, New York City Emergency Management, New York State Office Department Of Mental Hygiene, New York State Department Of Motor Vehicles, New York State Court Officers, New York State Department Of Corrections And Community Supervision, New York City Department Of Corrections, Federal Bureau Of Prisons, Attorney General Of New York, Solicitor General Of New York, Surgeon General Of The United States, Vivek Murthy, Center For Disease Control, Office Of Forensic Services And The New York State DNA Databank/New York State DNA Databank, Combined DNA Index System, National DNA Index System, State DNA Index System, Local DNA Index System, Division Of Criminal Justice Services, New York City Office Of Chief Medical Examiner, United States Secret Service, Federal Bureau Of Investigation, Central Intelligence Agency, Cybersecurity And Infrastructure Security Agency, Bureau Of Alcohol Tabaco Firearms Explosives, Drug Enforcement Administration, Federal Air Marshal Service, United States Immigration And Customs Enforcement, United States Marshalls Services, Internal Revenue Service, United States Department Of Justice, Department Of Homeland Security, Department Of Defense, Department Of Defense Serum Repository, National Oceanic And Atmospheric Administration, United States Coast Guard, United States Department Of The Navy, United States Department Of The Army, United States Department Of The Air Force, New York Guard, New York Army National Guard, New York Air National Guard, New York Naval Militia, United States State Department, United States Court Of International Trade, United States Department Of The Treasury, National Credit Union Administration, Treasury Department, Federal Credit Union,

The Federal Reserve System, Federal Reserve Police Department, Amtrak Police Department, Department Of Environmental Protection, Federal Communications Commission, Federal Trade Commission, U.S. Security And Exchange Commission, Washington, D.C. United States Capitol Police, New York State Athletic Commission, New York State Gaming Commission, Metropolitan Transportation Authority, Metropolitan Transportation Authority Police Department et al., and alleges as follows:

1. The Victims' Rights And Restitution Act (VRRRA), 42 U.S.C. §10607, ensures victims are entitled:

To be notified they have been the victim of a federal crime.

To be informed of the place where they may receive medical and social services.

To be informed of public and private programs available for counseling, treatment, and other support services.

To receive reasonable protection from a suspected offender and persons acting in concert with or at the behest of the suspected offender.

To know the status. of the investigation of the crime, to the extent it is appropriate and it will not interfere with the investigation.

To have personal property being held for evidentiary purposes maintained in good condition and returned as soon as it is no longer needed for evidentiary purposes.

2. Additionally, the Crime Victims' Rights Act (CVRA) of 2004, 18 U.S.C. §3771 provides that officers and employees of the department of justice shall make their best efforts to see crime victims are notified of, and accorded, the following rights:

The right to be reasonably protected from the accused.

The right to reasonable, accurate, and timely notice of any public court proceeding, or any parole proceeding, involving the crime or of any release or escape of the accused.

3. The Plaintiff's rights above have been violated by law enforcement and government officials. Plaintiff further believes the violation of these rights was purposefully done by law enforcement and government officials to prevent criminal proceedings and civil action against government officials, law enforcement officers, and private, non-government individuals.

4. Equipment used to treat mental disorders common among drug users was illegally installed and repeatedly reinstalled from 2021 and continuously through 2025. It was used and maintained without Plaintiff's consent and to Plaintiff's detriment by New York State Police (NYSP), City Of New York Police Department (NYPD), including its Police Communications Technicians (CT); Department Of Investigation (DOI); Crime Scene Investigators (CSI); Special Victims Unit (SVU); Internal Affairs (IA); Members Of The Israel Defense Force (IDF) Within The NYPD & FDNY And Other United States Law Enforcement; And Housing Bureau (NYHBP), And By The Office Of The Sheriff Of The City Of New York (NYCSO), New York State Court Officers (NYSCO), Police Benevolent Association Of The City Of New York (PBA), New York State Fraternal Order Of Police (NYSFOP), New York City Department Of Corrections (NYCDOC), City Of New York Comptroller, New York State Department Of Corrections And Community Supervision (NYSDOCCS), Metropolitan Transportation Authority Police Department (MTAPD), New York State Park Police (NYSPP), New York State University Police (NYSUP), Fire Department Of The City Of New York (FDNY), Port Authority Of New York And New Jersey Police Department (PAPD), New York Guard (NYG), New York Army National Guard (NYANG), New York Air National Guard (NY ANG), New York Naval Militia (NYNM), New York State Division Of Military And Naval Affairs

(NYSDMNA), New York State Athletic Commission, New York State Gaming Commission and others in government and by companies, celebrities, athletes et al. The equipment is used to treat anxiety, panic attacks, depression, and sleep disorders associated with narcotic drug use.

5. The equipment is also used to map out the different regions of the brain and to trigger them, including sexual functions for opioid users, anabolic steroid users, antidepressants users and other chemical users, and for people who have loss sexual function due to injury.

6. Attorney General of New York, Letitia James; Governor of New York, Kathy Hochul; Solicitor General of New York, Barbara Underwood et al., used the equipment in a sexual assault manner on Plaintiff. Males in government positions, including united states attorney, Damian Williams (and other united states attorneys), male District Attorneys in New York et al., also used the equipment - without consent - in a sexual manner against Plaintiff before handing it over to women in their offices. These unwanted sexual acts upon Plaintiff along with other assaults, stalking, harassment, battery, eavesdropping, making governmental services unavailable to me, preventing m Plaintiff's freedom of movement and other crimes against Plaintiff are a violation of Plaintiff's civil rights. Plaintiff's civil rights were violated based on Plaintiff's perceived race, religion, political association, political stance, gender and sexual orientation. Racist remarks were made to Plaintiff about Plaintiff's racial background.

7. There was a black-market where businessmen and women and politicians and police officers traded favors for cash, drugs, sex, company shares, real-estate, new homes and apartments. Post-office offers for officials to avoid criminal and civil charges related to crimes against Plaintiff committed by business executives and celebrities occurred. Political campaign fund raising and political favors for officials put celebrities and business executives and their colleagues, families, friends, university officials, officials from political action committees et al.,

on the system for financial profit, leniency against past and future crimes, sexual favors from celebrities and co-workers, to enhance their company's profile, advance their individual careers, and enhance their lives to Plaintiff's detriment. Prospect politicians from law firms, local and state law enforcement and federal law enforcement, including the FBI and Secret Service as well as from the military received offers in New York, New Jersey, Florida, Texas, California et al. to go into political state and federal office in upcoming years.

8. Free and discounted merchandise from tech companies, department stores, and TV offers were offered to politicians and law enforcement to Plaintiff's detriment by continuing to engage the system. Politicians were also bribed with offers to clear their political rival field before election by companies and entertainers involved. Moreover, new homes were promised to politicians and witnesses. New homes were offered in New York, New Jersey, Connecticut, Pennsylvania, California, Hawaii, Puerto Rico, Virgin Islands, Jamaica, and Canada to witnesses. New York politicians received post-retirement job offers from business executives to look the other way to their crimes against Plaintiff.

9. Medical patient simulators, virtual medical patient simulators, crash test dummies, virtual crash test dummies, and other anthropomorphic test devices used in medical schools and crash simulations were connected to the equipment installed without Plaintiff's consent in Plaintiff's home. These devices received multiple shots to the head, groin and spine repeatedly inflicted with fists, a sledgehammer, defibrillator, firearms fired and other weapons meant to affect Plaintiff's physical and mental health and wellbeing in negative and adverse ways and eventually meant to be fatal to Plaintiff.

10. A gas chromatography-mass spectrometry was repeatedly used by female officials, female prosecutors, female judges, female business executives, female athletes, female

celebrities, and the wives of male officials, prosecutors, judges, business executives, athletes, and celebrities leaving a rancid-putrid smell and taste that lingers and caused stress, embarrassment, pain and confusion.

11. The Attorney General of New York, Letitia James and family; New York Governor, Kathleen Hochul and family; Solicitor General of New York Barbara Underwood and family et al., took part in these crimes against Plaintiff and used government resources to cause Plaintiff harm.

12. Furthermore, they used their positions within government to direct New York capitol police, New York state police, city of New York police, New York City Department Of Corrections, New York state department of corrections and community supervision et al., to intentionally harm Plaintiff by having them constantly engage the equipment. Attorney General, James; Governor, Hochul; Solicitor, Underwood; Commissioner Tisch; Mayor, Adams et al., personally directed and supervised police officers, political officials, business executives, celebrities et al., to use the illegally installed equipment while on narcotics and under the influence of narcotics for gifts, services, and political campaign contributions. They did this repeatedly without Plaintiff's consent and without regard to Plaintiff's feelings nor wellbeing. Plaintiff was threatened and harassed night and day by the mayor and his security detail.

13. They sent hundreds of hours of video of sexual and macabre content to me. Plaintiff received lots of video involving pedophilia sent by officials and politicians, including United States Vice President, Kamala Harris and California Governor, Gavin Newsom. The United States Secret Service, United States Department Of Justice, United States State Department, Federal Bureau Of Investigation, Federal Bureau Of Prisons, New York Corrections (NYCDOC & NYSDOCCS) et al., placed officers, and inmates housed in prisons on the system and

connected them to Plaintiff without Plaintiff's approval nor consent. People incarcerated for some of the most heinous crimes such as terrorism & mass murder were also made to communicate with me, some for days and weeks on end after the equipment was used. Some inmates on anti-psychotic medication were used to harm Plaintiff by placing the equipment on them after wealthy individuals used it. Plaintiff was left disoriented, in pain, in a state of confusion and catatonic. Overseas FBI agents solicited inmates from host nations for sessions that lasted all day and all-night leaving Plaintiff in physical agony and mentally exhausted, Plaintiff felt tortured. The Secret Service of each former President, White House Secret Service, FBI, NYPD, LAPD, Miami PD et al., endangered Plaintiff's health and life by engaging system regularly looking for celebrities for sex and cash. The FBI and Secret Service sent thousands of hours of pornography through to keep system engaged for drug user use and "likes" for celebrities and politicians. The U.S. Department of Justice, U.S. Attorney General, Federal Bureau of Prisons et al., put inmates to hold system down regularly. This system was used to procure favors from VIPs for politicians. Amount of neuro activity led Plaintiff to convulsions. Donald Trump attorneys: Emil Bove, Jay Sekulow, Joseph Tacopina, Arthur L. Aidala Walter Joseph Clayton et al., held the line open for their law firms, Donald Trump, Trump family members, celebrities, state and federal officials, Secret Service agents, FBI agents et al. They got former clients and inmates they represented to hold the line open for months. Bove, Sekulow, Aidala and Tacopina put through graphic sex involving themselves with well-known celebrities and hundreds of hours of pornography including pedophile video of adults engaging in sex with children.

14. New York State Police and City of New York Police Department was given such latitude by the district attorney's office that some officers tried to remove Plaintiff at any time from

Plaintiff's home to replace Plaintiff on the system to collect career promotions, monies, gifts, services, and sex from their superiors, companies, and celebrities involved. Law enforcement was misused and encouraged to harass and to marginalize Plaintiff by getting local police officers and federal police officers in New York to participate in a scheme where they obtained personal information on Plaintiff and shared it with others involved, including business executives, celebrities, politicians, officials, and other local law enforcement, state law enforcement, federal law enforcement, united kingdom and Canadian law enforcement et al. Federal agencies such as the united states secret service and the federal bureau of investigation were particularly involved in gathering and sharing personal information on me. Many of these people, including New York officials, business executives, and celebrities went to Plaintiff's home and the home of family to harass, intimidate, and alarm me. They caused emotional distress and pain by passing intrusive video of themselves at work and other environments and in intimate situations.

15. They attached gaming systems that caused Plaintiff pain and suffering by adding repetitive, violent, and intrusive video materials meant to cause confusion, disorientation, and cognitive impairment. Company executives and celebrities bribed politicians, judges, prosecutors, law enforcement officials, witnesses et al., in New York, New jersey, California, Florida, Texas, Canada, united kingdom, Australia et al., with money, company shares, gifts, services, and sex in a quid pro quo in return for forgiveness to these offenses. Companies and celebrities contributed to a money account to bribe witnesses and others involved and to pay officials. New York corrections officers, police officers and fire officers routinely came to Plaintiff's home to intimidate me, some performing lewd acts in front of me.

16. Plaintiff was threatened by New York capitol police, New York state police, city of New York police et al., with Plaintiff's DNA being collected and inserted into numerous private and public DNA, RNA, and MDNA databanks across the nation and that a rape kit with Plaintiff's DNA would be created nationwide. Plaintiff was threatened by these people with being infected with a virus.

17. The New York police department used police officer body camera footage of Plaintiff and Plaintiff's home to get impersonators of Plaintiff and mimic Plaintiff's living condition. This body camera footage was shared with corrections officers, news networks, entertainers et al., who insisted to the NYPD that Plaintiff be "collared" for anything so that they could have video footage of their own of me. The footage was given to sheriff departments, police departments, and federal agencies across the country to embarrass and humiliate me. It was also used to commit crimes, and to garner favors from celebrities by police officers, federal agents et al.

18. State and federal officials, governors, mayors, law enforcement et al., oversaw impersonators pretend to be Plaintiff across the country and internationally. Plaintiff received video of these impersonators committing acts of crime and engaging in homosexuality. Some committing theft, rape and murder while pretending to be me, using Plaintiff's name, false identification cards, including from the New York department of motor vehicles, issued by other states and from the state department as passports. Plaintiff later received video of these same impersonators being killed.

19. Plaintiff was told by New York judges and city council members in New York city that Plaintiff had to be black, gay or Muslim to receive services in New York or pay. Plaintiff was repeatedly denied services by the New York city police department and the New York fire department. Plaintiff was targeted due to Plaintiff's race. And was told by numerous. officials,

companies and celebrities that only black people in New York rights are protected, including attorney general Letitia James, NYPD commissioner Keechant Sewell and state senator Andrea Stewart-Cousins.

20. NY Governor, Andrew Cuomo: “it’s illegal. You will get concessions from New York state government.”

21. NY Governor, Kathy Hochul: “I owe you concessions.” “you’ll get what you deserve and then some.”

22. NY Attorney General, Letitia James: “this is illegal and the entire state owes you, as do I.” “I need you to recommit.”

23. NY Solicitor General, Barbara Underwood: “you need to come see me when you’re ready.” “the state owes you.”

24. NYC Mayor, Eric Adams: “everyone is rooting for you.” “everyone in city hall used it.” “one police plaza owes you and I owe you.”

25. FDNY Commissioner, Laura Kavanaugh: “the fire department owes you.” “I will make it up to you later in life.”

26. NYPD commissioner, Edward Caban: “the entire police department owes you.”

27. NYPD commissioner, Keechant Sewell: “one police plaza owes you.”

28. NYPD commissioner, Jessica Tisch: “I owe you.” “city hall is in your debt.”

29. On July 19, 2023, Plaintiff was sent live video of President Donald Trump in the lobby of the united states district court building for the Southern District of New York shouting “liar” at e. Jean Carroll as she departed the elevator with lawyer Roberta Kaplan following the verdict; Trump was signing books.

30. On August 4, 2023, Plaintiff was sent live NYPD video of inside the union square, New York city wholefoods store during the riot at union square park. Plaintiff saw the chiefs from the NYPD backing up into the store and rioters outside nearing the automatic doors.

31. From 2022 through 2023 Plaintiff received video from senator, Charles Schumer in the U.S. Capitol engaging in strange behavior sometimes with other senators, including patty Murray. One time involving a paper cup passed to each senator spitting in the cup with a camera at the bottom of the cup. Plaintiff received video from other senators and the forementioned prior and after this time.

32. From 2021 through 2022 Plaintiff received video from vice chair of the House January 6 committee, Liz Cheney in her U.S. Capitol office where there were discussions on recommending criminal charges against Donald Trump.

33. Plaintiff routinely received intrusive live video from United States Senators engaging in sexual acts and involving spousal abuse. Plaintiff also received intrusive video from their work offices and their homes taunting Plaintiff and yelling at Plaintiff to wake up to keep Plaintiff awake, repeatedly, including from every FBI field office in the country.

34. Plaintiff received disturbing video where they appeared inebriated and under the influence of narcotics. They sent video depicting people being assaulted, raped, bound, tortured and killed, including children. Pedophilia videos were put through regularly when these officials were on. The system was used to request drugs from executives and celebrities and a faux dragnet as cover. Collusion between these parties and others has occurred to defraud Plaintiff of Plaintiff's rights and these parties have conspired to accomplish something forbidden by law causing moral injury to Plaintiff.

PARTIES

1. Vice President Of The United States, Kamala Davi Harris (& Spouse Douglas Craig Emhoff).
2. Federal Bureau Of Investigation (FBI) Director, Christopher Asher Wray.
3. White House Press Secretary, Karine Jean-Pierre.
4. White House Press Secretary, Jennifer Rene Psaki.
5. United States Attorney General, Merrick Garland.
6. United States Deputy Attorney General, Emil Bove.
7. United States Attorney, Walter Joseph Clayton
8. Senior Advisor To The President, Anita Dunn.
9. Secretary Of Homeland Security, Alejandro Nicolas Mayorkas.
10. Director Of The Office Of Management And Budget, Shalanda Delores Young.
11. United States Attorney, Andre Damian Williams Jr.
12. United States Attorney, Audrey Strauss.
13. New York State Senate.
14. New York State Assembly.
15. New York Court Of Appeals.
16. New York City Council.
17. U.S. House Of Representatives, Hakeem Jeffries.
18. U.S. House Of Representatives, Jerry Nadler.

19. U.S. House Of Representatives, Adriano Espaillat.
20. U.S. House Of Representatives, Alexandria Ocasio-Cortez.
21. U.S. House Of Representatives, Ritchie Torres.
22. U.S. House Of Representatives, Jamaal Bowman.
23. Office Of District Attorney Of Richmond County, New York.
24. Office Of District Attorney Of Queens County, New York.
25. Office Of District Attorney Of Kings County, New York.
26. Office Of District Attorney Of New York County, New York.
27. Office Of District Attorney Of Bronx County, New York.
28. Office Of District Attorney Of Nassau County, New York.
29. Office Of District Attorney Of Suffolk County, New York.
30. Office Of District Attorney Of Westchester County, New York.
31. Fire Department Of The City Of New York (FDNY).
32. FDNY Commissioner, Laura Kavanaugh And NYPD Security Detail.
33. FDNY Commissioner, Daniel Nigro.
34. New York City Hall.
35. Mayor Of The City Of New York, Bill De Blasio.
36. Mayor Of The City Of New York, Eric Adams And NYPD Security Detail.
37. Governor Of New York, Andre Cuomo.
38. Governor Of New York, Kathy Hochul And Security Detail.
39. MTA Chairman And Chief Executive Officer, Janno Lieber.
40. New York State Police (NYSP).

41. City Of New York Police Department (NYPD) - Police Communications Technicians, Department Of Investigations.
42. NYPD Commissioner, Jessica Tisch.
43. NYPD Commissioner, Edwad Caban And NYPD Security Detail.
44. NYPD Commissioner, Keechant Sewell And NYPD Security Detail.
45. NYPD Commissioner, Dermot Shea And NYPD Security Detail.
46. Deputy Commissioner Of Intelligence And Counterterrorism Of NYPD, John Miller.
47. New York State Department Of Corrections And Community Supervision (NYSDOCCS).
48. New York City Department Of Corrections (NYCDOC).
49. Attorney General Of New York (NYAG).
50. Solicitor General Of New York (NYSG).
51. United States Secretary Of Transportation, Peter Buttigieg.
52. United States Secretary Of Health And Human Services, Robert Kennedy Jr.
53. United States Secretary Of Education (Nominee), Linda Marie McMahon.
54. Surgeon General Of The United States, Vivek Murthy.
55. United States Ambassador, Caroline Kennedy.
56. United States Ambassadors, Rahm Emanuel.
57. United States Ambassador, Nikki Haley.
58. United States Ambassador, Meg Whitman.
59. United States Ambassador, Michelle Kwan.
60. United States Senator, John Fetterman.

61. United States Senator, Mark Kelly.
62. United States Senator, Charles Ellis Schumer.
63. United States Senator, Kirsten Gillibrand.
64. United States Senator, Cory Booker.
65. United States Senator, Richard Blumenthal.
66. United States Secretary Of State, Anthony Blinken.
67. Prime Minister Of Canada, Justin Trudeau.
68. Parliament Of Canada.
69. Canadian Armed Forces.
70. President Of Mexico, Claudia Sheinbaum.
71. President Of Mexico, Andres Manuel Lopez Obrador.
72. Associate Justice Of The Supreme Court Of Justice Of The Nation, Norma Lucia Pina Hernandez. (Mexico)
73. Federal Government Of Mexico.
74. Parliament Of The United Kingdom Of Great Britain And Northern Ireland.
75. British Armed Forces.
76. Prime Minister Of The United Kingdom, David Cameron.
77. Prime Minister Of The United Kingdom, Gordon Brown.
78. Prime Minister Of The United Kingdom, Tony Blair.
79. Prime Minister Of The United Kingdom, Liz Truss.
80. Prime Minister Of The United Kingdom, Boris Johnson.
81. Prime Minister Of The United Kingdom, Theresa May.
82. Mayor Of London, England, Sadiq Khan.

83. Deputy Mayor Of London, England, Joanne McCartney.
84. London, England Metropolitan Police Service.
85. British Army (Household Division, King's Guard).
86. Israeli Defense Forces (IDF), Tsva Ha-Hagana Le-Yisra'el, Tzahal.
87. Israel Police.
88. Ministry Of National Security.
89. Prime Minister Of Israel, Benjamin Netanyahu.
90. Jerusalem City Council.
91. Knesset.
92. Likud-National Liberal Movement.
93. Policia Nacional De Colombia, National Police Of Colombia.
94. Ministerio De Defensa Nacional, Ministry Of National Defense (Of Colombia).
95. Fuerzas Militares De Colombia, Military Forces Of Colombia.
96. Ejercito Nacional De Colombia, National Army Of Colombia.
97. Armada Nacional De La Republica De Colombia, Colombian National Navy.
98. Fuerza Aerea Colombiana, Colombian Air Force.
99. U.S. Executive Office Of The President (EOP)
100. U.S. Homeland Security Council (HSC)
101. U.S. National Security Council (NSC)
102. White House Office Of The Press Secretary
103. U.S. Office Of Management And Budget (OMB)
104. U.S. Department Of Defense (DOD)
105. United States Secret Service (USSS)

- 106. Federal Correctional Institution, Danbury Connecticut
- 107. Federal Correctional Complex, Butner North Carolina
- 108. United States Penitentiary Florence Administrative Maximum Facility
- 109. Defense Advanced Research Projects Agency (DARPA)
- 110. Jet Propulsion Laboratory (JPL) / National Aeronautics And Space
Administration (NASA) / California Institute Of Technology (CALTECH)
- 111. United States State Department.
- 112. Federal Bureau Of Investigation (FBI).
- 113. Central Intelligence Agency (CIA).
- 114. Bureau Of Alcohol Tabaco Firearms Explosives (BATFE) (Aka: ATF).
- 115. Drug Enforcement Administration (DEA).
- 116. United States Customs And Border Protection (CBP).
- 117. Transportation Security Administration (TSA).
- 118. National Transportation Board (NTSB).
- 119. Department Of Homeland Security (DHS).
- 120. United States Department Of Energy (DOE).
- 121. United States Department Of Housing And Urban Development (HUD).
- 122. United States Department Of Veterans Affairs (VA).
- 123. Center For Disease Control (CDC).
- 124. United States Food And Drug Administration (FDA).
- 125. United States Department Agriculture (USDA).
- 126. Federal Communications Commission (FCC).
- 127. United States Department Of Energy (DOE).

- 128. Washington, D.C. United States Capitol Police.
- 129. New York State Athletic Commission.
- 130. New York State Gaming Commission.
- 131. Albany, New York Capitol Police.
- 132. Albany, Police Department (APD).
- 133. Office Of The Sheriff Of The City Of New York (NYCSO).
- 134. New York City Police Department Housing Bureau (NYHBP).
- 135. Port Authority Of New York And New Jersey (PANYNJ)
- 136. Port Authority Of New York And New Jersey Police Department (PAPD).
- 137. New York City Emergency Management (NYCEM).
- 138. New York State Court Officers (NYSCO).
- 139. New York Supreme Court.
- 140. Criminal Court Of The City Of New York.
- 141. Civil Court Of The City Of New York.
- 142. Metropolitan Transportation Authority (MTA).
- 143. Metropolitan Transportation Authority Police Department (MTAPD).
- 144. Federal Bureau Of Prisons (BOP).
- 145. New York State Department Of State (NYSDOS).
- 146. New York Health Department.
- 147. City Of New York Public Advocate.
- 148. New York City Office Of Technology And Innovation (OTI).
- 149. Federal Emergency Management Agency (FEMA).
- 150. North American Aerospace Defense Command (NORAD).

151. Federal Air Marshal Service (FAMS).
152. United States Marshalls Services (U.S.MS).
153. National Park Service Ranger (NPSR).
154. United States Immigration And Customs Enforcement (ICE).
155. New York Guard (NYG).
156. New York Army National Guard (NYANG).
157. New York Air National Guard (NY ANG).
158. New York Naval Militia (NYNM).
159. New York State Division Of Military And Naval Affairs (NYSDMNA).
160. United States Department Of Defense Police (DOD Police).
161. Walter Reed Army Institute Of Research (WRAIR).
162. Department Of Defense Serum Repository (DODSR).
163. United States Department Of Commerce (DOC).
164. National Oceanic And Atmospheric Administration.
165. United States Coast Guard (U.S.CG).
166. United States Department Of The Navy (NAVY).
167. United States Department Of The Army (ARMY).
168. United States Department Of The Air Force (AF).
169. Space Development Agency (SDA).
170. New York State Office Department Of Mental Hygiene (DMH).
171. New York State Department Of Motor Vehicles (DMV).
172. Internal Revenue Service (IRS).
173. United States Department Of Justice (DOJ).

- 174. United States District Court For The Southern District Of New York.
- 175. United States District Court For The Eastern District Of New York.
- 176. United States District Court For The Northern District Of New York.
- 177. United States District Court For The Western District Of New York.
- 178. United States Court Of International Trade.
- 179. Federal Trade Commission (FTC).
- 180. U.S. Security And Exchange Commission (SEC).
- 181. New York Criminal-Family-Civil County Courts Of Nasau & Suffolk.
- 182. Cybersecurity And Infrastructure Security Agency (CISA).
- 183. Mount Weather Emergency Operations Center.
- 184. National Fraternal Order Of Police (FOP).
- 185. Emerald Society Of The Federal Law Enforcement Agencies (ESFLEA).
- 186. United States Department Of The Treasury (USDT).
- 187. National Credit Union Administration (NCUA).
- 188. Treasury Department Federal Credit Union (TDFCU).
- 189. The Federal Reserve System (FRS).
- 190. Federal Reserve Police Department (FRPD).
- 191. Amtrak Police Department (APD).
- 192. Department Of Environmental Protection (Dep).
- 193. United States Mint (U.S. Mint).
- 194. United States Postal Service (U.S.PS).
- 195. Emerald Society Of The Police Department Of New York City (NYPD Emerald Society).

196. New York State Fraternal Order Of Police.
197. New York State Park Police (NYSPP).
198. New York State University Police (NYSUP).
199. Office Of Forensic Services And The New York State DNA Databank/New York State DNA Databank.
200. Combined DNA Index System (CODIS).
201. National DNA Index System (NDIS).
202. State DNA Index System (SDIS).
203. Local DNA Index System (LDIS).
204. Division Of Criminal Justice Services (DCJS).
205. New York City Office Of Chief Medical Examiner (COME) (DNA Index).
206. New York City Department Of Parks And Recreation (NYC Parks).
207. New York City Department Of Sanitation (DSNY).
208. New York City Department Of Sanitation Emerald Society (DSNY).
209. New York Department Of Transportation (NYDOT).
210. City Of New York Comptroller.
211. Florida Department Of Law Enforcement.
212. Florida Highway Patrol.
213. Florida Capitol Police Department.
214. Florida State University Police Department.
215. Florida State Athletic Commission.
216. Tallahassee, Florida City Hall.
217. Tallahassee, Florida Police Department.

- 218. Tallahassee, Florida Fire Department.
- 219. Jacksonville, Florida City Hall.
- 220. Jacksonville, Florida Sheriff Office.
- 221. Jacksonville, Florida Fire Department.
- 222. Orlando, Florida City Hall.
- 223. Orlando, Florida Police Department.
- 224. Orlando, Florida Fire Department.
- 225. Miami, Florida City Hall.
- 226. Miami, Florida Police Department.
- 227. Miami, Florida Fire Department.
- 228. Miami-Dade County, Florida Sheriff Department.
- 229. Governor Of Illinois, Jay Robert Pritzker.
- 230. Illinois State Police.
- 231. Chicago, Illinois City Hall.
- 232. Chicago, Illinois Police Department.
- 233. Chicago, Illinois Fire Department.
- 234. Cook County Sheriff Office.
- 235. Cook County Department Of Corrections.
- 236. Illinois Department Of Corrections.
- 237. Governor Of Colorado, Jared Polis.
- 238. Colorado State Patrol.
- 239. Colorado Department Of Correction.
- 240. Denver, Colorado City Hall.

- 241. Denver, Colorado Police Department.
- 242. Denver, Colorado Sheriff Department.
- 243. Denver, Colorado Fire Department.
- 244. Pennsylvania State Police.
- 245. Philadelphia, Pennsylvania City Hall.
- 246. Philadelphia, Pennsylvania Police Department.
- 247. Philadelphia, Pennsylvania Fire Department.
- 248. Boston, Massachusetts Police Department (BPD).
- 249. Boston, Massachusetts Fire Department.
- 250. Governor Of California, Gavin Newsom.
- 251. California State Police (CSP).
- 252. University Of California Police Departments.
- 253. California State Athletic Commission.
- 254. Richard J. Donovan Correctional Facility San Diego County California.
- 255. Orange County, California Board Of Supervisors:
- 256. Katrina Anne Foley
- 257. Douglas B. Chaffee
- 258. Vicente Flavio Sarmiento
- 259. Laguna Beach, California Police Department.
- 260. Laguna Beach, California Fire Department.
- 261. Anaheim, California Police Department.
- 262. Anaheim, California Fire Department.
- 263. Irvine, California Police Department.

- 264. Irvine, California Fire Department.
- 265. Santa Monica, California City Hall.
- 266. Santa Monica, California Police Department.
- 267. Santa Monica, California Fire Department.
- 268. Los Angeles, California City Hall.
- 269. Los Angeles, California Police Department.
- 270. Los Angeles, California Fire Department.
- 271. Los Angeles County, California Sheriff Department.
- 272. San Diego, California City Hall.
- 273. San Diego, California Police Department.
- 274. San Diego, California Fire Department.
- 275. San Francisco, California City Hall.
- 276. San Francisco, California Police Department.
- 277. San Francisco, California Fire Department.
- 278. San Francisco Recreation & Parks Department.
- 279. Hollywood, California City Hall.
- 280. Hollywood, California Police Department.
- 281. Hollywood, California Fire Department.
- 282. Beverly Hills City Hall.
- 283. Beverly Hills Police Department.
- 284. Beverly Hills Fire Department.
- 285. Governor Of New Jersey, Philip Murphy.
- 286. New Jersey State Police.

- 287. Trenton, New Jersey City Hall.
- 288. Trenton, New Jersey Police Department.
- 289. Trenton, New Jersey Fire Department.
- 290. Camden, New Jersey City Hall.
- 291. Camden, New Jersey Police.
- 292. Camden, New Jersey Fire Department.
- 293. Hoboken, New Jersey City Hall.
- 294. Hoboken, New Jersey Police Department.
- 295. Hoboken, New Jersey Fire Department.
- 296. Jersey City, New Jersey City Hall.
- 297. Jersey City, New Jersey Police Department.
- 298. Jersey City, New Jersey Fire Department.
- 299. Fort Lee, New Jersey City Hall.
- 300. Fort Lee, New Jersey Police Department.
- 301. Fort Lee, New Jersey Fire Department.
- 302. Mayor Of Newark, New Jersey, Ras Jua Baraka.
- 303. Newark, New Jersey City Hall.
- 304. Newark, New Jersey Police Department.
- 305. Newark, New Jersey Fire Department.
- 306. Atlantic City, New Jersey City Hall.
- 307. Atlantic City, New Jersey Police Department.
- 308. Atlantic City, New Jersey Fire Department.
- 309. Alaska State Troopers.

- 310. Anchorage, Alaska City Hall.
- 311. Anchorage, Alaska Police Department.
- 312. Anchorage, Alaska Fire Department.
- 313. Vivek Ganapathy Ramaswamy (Ohio Governor Prospect).
- 314. Ohio, Cleveland Division Of Police (CDP).
- 315. Ohio, Cleveland Division Of Fire (CDF).
- 316. Ohio, Cincinnati Police Department.
- 317. Ohio, Cincinnati Fire Department.
- 318. Ohio, Columbus. Division Of Police (CPD).
- 319. Ohio, Columbus. Division Of Fire (CFD).
- 320. Hawaii Department Of Law Enforcement, Sheriff Division.
- 321. Hawaii Police Department.
- 322. Honolulu, Hawaii City Hall.
- 323. Honolulu, Hawaii Police Department.
- 324. Honolulu, Hawaii Fire Department.
- 325. Nevada State Police.
- 326. Nevada State Athletic Commission.
- 327. Las Vegas, Nevada City Hall.
- 328. Las Vegas, Nevada Police Department.
- 329. Las Vegas, Nevada Fire Department.
- 330. Reno, Nevada City Hall.
- 331. Reno, Nevada Police Department.
- 332. Reno, Nevada Fire Department.

- 333. Governor Of Georgia, Brian Kemp.
- 334. Georgia State Police.
- 335. Fulton County District Attorney, Fani Willis.
- 336. Fulton County, Georgia Sheriff Office.
- 337. Atlanta, Georgia City Hall.
- 338. Atlanta, Georgia Police Department.
- 339. Atlanta, Georgia Fire Department.
- 340. Arizona Department Of Public Safety.
- 341. Maricopa County, Arizona Sheriff's Office.
- 342. Maricopa County, Arizona Board Of Supervisors.
- 343. Louisiana State Police.
- 344. New Orleans, Louisiana City Hall.
- 345. New Orleans, Louisiana Police Department.
- 346. New Orleans, Louisiana Fire Department.
- 347. Jefferson Parish, Louisiana Sheriff.
- 348. North Caroline Highway Patrol.
- 349. Charlotte, North Caroline City Hall.
- 350. Charlotte, North Caroline Police Department.
- 351. Charlotte, North Caroline Fire Department.
- 352. South Carolina Highway Patrol.
- 353. Charleston, South Carolina City Hall.
- 354. Charleston, South Carolina Police Department.
- 355. Charleston, South Carolina Fire Department.

- 356. Governor Of Minnesota, Timothy Walz.
- 357. Minneapolis, Minnesota City Hall.
- 358. Minneapolis, Minnesota Police Department.
- 359. Minneapolis, Minnesota Fire Department.
- 360. Saint Paul, Minnesota City Hall.
- 361. Saint Paul, Minnesota Police Department.
- 362. Saint Paul, Minnesota Fire Department.
- 363. Washington State Patrol.
- 364. Washington State Department Of Corrections.
- 365. Seattle, Washington City Hall.
- 366. Seattle, Washington Police Department.
- 367. Seattle, Washington Fire Department.
- 368. Governor Of Michigan, Gretchen Whitmer.
- 369. Michigan State Police.
- 370. Michigan Department Of Corrections.
- 371. Detroit, Michigan City Hall.
- 372. Detroit, Michigan Police Department.
- 373. Detroit, Michigan Fire Department.
- 374. Texas Ranger Division.
- 375. Arlington, Texas City Hall.
- 376. Arlington, Texas Police Department.
- 377. Arlington, Texas Fire Department.
- 378. San Antonio, Texas City Hall.

- 379. San Antonio, Texas Police Department.
- 380. San Antonio, Texas Fire Department.
- 381. Austin, Texas City Hall.
- 382. Austin, Texas Police Department.
- 383. Austin, Texas Fire Department.
- 384. Fort Worth, Texas City Hall.
- 385. Fort Worth, Texas Police Department.
- 386. Fort Worth, Texas Fire Department.
- 387. Dallas, Texas City Hall.
- 388. Dallas, Texas Police Department.
- 389. Dallas, Texas Fire Department.
- 390. Legal Aid Society.
- 391. New York State Bar Association (NYSBA).
- 392. Tower 1, Joint Venture LLC.
- 393. Larry A. Silverstein.
- 394. Silverstein Properties Incorporated, OHIO EST.
- 395. THR Management LP.

JURISDICTION AND VENUE

This court has original jurisdiction over the claims for relief asserted in this cross-complaint pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and some Defendants are not citizens of the same state as the Plaintiff.

This court has personal jurisdiction over the Defendants under and consistent with the constitutional requirements of Due Process in that the Defendants, acting directly or through his agent or apparent agent, committed one or more of the following: a. The transaction of any business within the state; b. The making of any contract within the state; c. The commission of a tortious act within this district and d. The ownership, use, or possession of any real estate in this state.

Pursuant to § 301 of the New York civil practice law and rules because all Defendants systematically and continuously conduct and solicit business within the State of New York and from 2021 to 2025, Defendants have consistently and purposefully availed themselves of the privilege of conducting activities within New York State, thus invoking the benefits and protections of New York law. In return for these benefits and protections, Defendants must submit to the burdens of litigation in New York.

This court may exercise personal jurisdiction over Defendants pursuant to § 302 of the New York Civil Practice Law and Rules, including because, upon information and belief, all Defendants transact and solicit business within the state, have committed the tortious acts described in this complaint within the state, and/or have committed such acts outside of the state causing injury to Plaintiff within the state.

This litigation arises from or relates to the tortious activities Defendants visited upon Defendants in the states of New York, Connecticut, New Jersey, California, Florida, and other states.

This tortious conduct violated United States Federal Rico Laws.

Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and (c), because a substantial part of the events or omissions giving rise to these claims occurred in this district and because Defendants are subject to personal jurisdiction in this district.

Requiring Defendants to litigate these claims in this district does not offend traditional notions of fair play and substantial justice.

Plaintiff's claims arise from some conduct occurring by Defendants in New York.

PRAYER FOR RELIEF

Wherefore, Plaintiffs pray for the following relief:

1. For a money judgment representing compensatory damages, including
Consequential damages, lost wages, earnings, and all other sums of money, together with interest
On those amounts, in an amount to be proven at trial.
2. For an award of money judgment for mental pain and anguish and severe and
serious emotional distress, as applicable, in an amount to be proven at trial.
3. For pre- and post-judgment interest.
4. For punitive damages according to proof.
5. For attorney's fees and costs incurred by Plaintiff, as applicable.
6. For such other legal and equitable relief as the court deems appropriate.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all causes of action so triable.

Dated: February 19, 2025
New York, NY



LUIS DANNY SOTO

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BRONX, NEW YORK 10454

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332.227.4049

Attention Clerk,

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SDNY PRO SE OFFICE
2025 FEB 20 AM 11:42

Defendants Include:

United States Attorney, Walter Joseph Clayton

United States Attorney, Andre Damian Williams Jr.

Mayor of the City of New York, Eric Adams And NYPD Security Detail

NYPD Commissioner, Jessica Tisch